



0000104222

Craig Raby (014010)

**MARGRAVE, CELMINS & VERBURG, P.C.**

7201 East Camelback Road, Suite 330

Scottsdale, Arizona 85251

(602) 994-2000

Attorneys for American Nortel Communications, Inc.

**DOCKETED**RECEIVED  
AZ CORP COMMISSION

SEP 26 10 00 AM '97

DOCUMENT CONTROL

SEP 26 1997

ARIZONA CORPORATION COMMISSION

SECURITIES DIVISION

DOCKETED BY

In the Matter of )

No. S-3218-I

AMERICAN NORTEL COMMUNICATIONS,  
INC. (S-3218-I) )REPLY TO RESPONSE  
TO MOTION TO QUASH  
SUBPOENA DUCES TECUM

(Request for Hearing)

On or about September 17, 1997, the undersigned counsel filed a motion to quash subpoena. All of the contents of the motion to quash subpoena are reinstated herein.

On or about September 23, 1997, American Nortel Communications, Inc. ("American") filed a response to subpoena duces tecum with reservation of all rights. As part of that response, substantial documentation has been provided by American to the Arizona Corporation Commission, Securities Division. Apparently the documentation provided had been previously discussed by and between American's previous counsel and representatives of the Securities Division of the Arizona Corporation Commission.

In conclusion, American restates the position expressed in its motion to quash subpoena. However, American further states that it has produced substantial documentation in response to the subpoena but has produced the documentation without waiving any

1 rights asserted in the motion to quash subpoena and without waiving  
2 any other rights that may exist. Further, American is willing to  
3 cooperate with the Securities Division of the Arizona Corporation  
4 Commission to the extent appropriate.

5 DATED this 25<sup>th</sup> day of September 1997.

6 MARGRAVE, CELMINS & VERBURG, P.C.

7  
8 By Craig Raby

9 Craig Raby  
10 Attorney for American Nortel  
11 Communications, Inc.

12 **ORIGINAL AND TEN COPIES** of the  
13 foregoing mailed this 25<sup>th</sup> day  
14 of September 1997 to:

15 Docket Control  
16 Arizona Corporation Commission  
17 1200 West Washington Street  
18 Phoenix, Arizona 85007

19 **COPY** of the foregoing mailed  
20 this 25<sup>th</sup> day of September 1997 to:

21 Brian J. Schulman, Senior Counsel  
22 Arizona Corporation Commission  
23 Securities Division  
24 1300 West Washington, 3rd Floor  
25 Phoenix, Arizona 85007

26 Diane C. Bright